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BEFORE THE
Federal Communications Commission
WASHINGTON, DC 20554

In the Matter of)

Guidelines for Evaluating the Environmental)
Effects of Radiofrequency Radiation)

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APR 2 1997
Federal Communications Commission
Office of Secretary

) ET Docket No. 93-62

COMMENTS OF ARCH COMMUNICATIONS GROUP, INC.

Pursuant to Section 1.429(f) of the Commission's rules, Arch Communications Group, Inc. ("Arch"), hereby submits brief comments in support of the Petitions for Partial Reconsideration filed January 23, 1997, seeking extension of the deadline for compliance with the Commission's new radiofrequency (RF) emission rules.¹

On August 1, 1996, the Commission released its *Report and Order* in the above-referenced proceeding. The Commission initially adopted a January 1, 1997, deadline for compliance with the RF emission guidelines.² In the *Report and Order*, the Commission indicated its intent to issue an updated OET Bulletin 65 in the near future.³ On December 24, 1996, the Commission extended the RF emission compliance deadline to September 1, 1997, concluding in part that such an extension would "allow applicants to review the

¹ See Ameritech Mobile Communications, Inc. ("Ameritech"), Petition for Partial Reconsideration in ET Docket No. 93-62, filed January 23, 1997, at 1-4; Northeast Louisiana Telephone Co., Inc., Petition for Partial Reconsideration in ET Docket No. 93-62, filed January 23, 1997, at 1-4.

² *Guidelines for Evaluating the Environmental Effects of Radiofrequency Radiation, Report and Order*, ET Docket No. 93-62, FCC 96-326 (released August 1, 1996).

³ *Id.* ¶ 114.

revised [OET] Bulletin 65 and to make the necessary measurements or calculations to determine that they are in compliance.”⁴ The Commission also stated that “we intend to release a revised Bulletin 65 shortly after we address the other outstanding issues in this proceeding.”⁵

To date, the Commission has not released the OET Bulletin 65. However, the review, evaluation and dissemination of the information which will be contained in OET Bulletin 65 remains essential to compliance with the Commission’s RF emission guidelines. As the Commission is aware, many in the wireless industry have raised questions concerning the new RF emission rules and are awaiting the guidance to be provided in the updated OET Bulletin for purposes of evaluating their compliance activities.

Arch for example, has thousands of paging transmitters throughout its extensive service areas. Thus, Arch’s site-by-site, base station evaluation will necessarily be time-consuming once the OET Bulletin is released and reviewed by Arch personnel. For these reasons, Arch supports the Petitions for Partial Reconsideration filed by Ameritech and Northeast Louisiana Telephone Company which request that the Commission further extend the compliance deadline beyond the current September 1, 1997 date. Specifically, if the revised OET Bulletin No. 65 resolves the numerous complex issues raised on reconsideration, Arch urges the Commission to delay the effective date of the new RF emission rules from September 1, 1997 until one year after the release of OET Bulletin No. 65.

⁴ *Guidelines for Evaluating the Environmental Effects of Radiofrequency Radiation, First Memorandum Opinion and Order*, ET Docket No. 93-62, FCC 96-487, ¶ 7 (released December 24, 1996).

⁵ *Id.* ¶ 5 n.10.

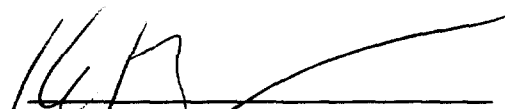
requested additional extension will help ensure orderly, timely and complete compliance with the new RF guidelines without harming public safety.⁶ If the revised Bulletin does not resolve the numerous complex issues raised on reconsideration, however, complying with the Commission's new RF emission guidelines will likely be impossible even one year after the Bulletin's release. In this case, Arch requests that the Commission further delay the effective date of the new RF emission guidelines until such time as carriers have had an opportunity to resolve all issues raised on reconsideration and comply accordingly.

For the foregoing reasons, Arch respectfully requests that the Commission grant Petitioners' requests to extend the RF emission compliance deadline.

Respectfully submitted,

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April 2, 1997

⁶ Arch also supports Ameritech's and Northeast Louisiana Telephone Company's proposal that the Commission take a flexible approach with respect to granting waiver requests. *See* Ameritech Petition at 3-4; Northeast Louisiana Telephone Company Petition at 3.

CERTIFICATE OF SERVICE

I, Joy Griffiths, do hereby certify that I have, on this 2nd day of April, 1997, caused to be served by first class U.S. mail, postage prepaid, a copy of the foregoing Comments to the following:

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